

# Exhibit 51

Page 1

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

OAN The Real Story - OAN Pennsylvania Shenanigans  
with Rudy Giuliani, Rumble  
December 11, 2021

Plaintiffs' Exhibit

**PTX-23**

C.A. No. 21-3354 (BAH)

1           NATALIE HARP: It's been just over  
2           three weeks since whistleblower videos were  
3           released showing the shenanigans that went on in  
4           Delaware County, Pennsylvania, after a right-to-  
5           know request was filed back in May.

6           Videos showing clear violations of  
7           Pennsylvania law, that records must be kept  
8           intact for 11 months. And according to federal  
9           law for 22 months, after election day.

10          Now, new whistleblower video has just  
11          been released exposing more of what exactly what  
12          went on behind the scenes. But before we get to  
13          that, first let's review the videos previously  
14          released.

15          And while you're watching ask yourself,  
16          have you even seen any of this covered by the  
17          lamestream media, or have you seen any of these  
18          officials held accountable for what they did?  
19          Meet the dream team.

20          VOICEOVER: This is Jim Savage and  
21          James Allen discussing getting rid of the pads  
22          and second scanners.

23          [VIDEO PLAYS]

24          Here is Tom Gallagher discussing the v-  
25          drive handling with the whistleblower.

1 [VIDEO PLAYS]

2 Here is Tom Gallagher again, lawyer for  
3 Delaware County, destroying voting machine tapes  
4 to bypass the right-to-know request.

5 [VIDEO PLAYS]

6 NATALIE HARP: Seen enough, heard  
7 enough? Well, that's not all because according  
8 to whistleblower video just released, while  
9 making copies of certain records in order to  
10 comply with the same right-to-know request, Tom  
11 Gallagher and James Ziegelhoffer begin talking  
12 about how they plan to alter that evidence too.

13 [VIDEO PLAYS]

14 But come on man, there's nothing to see  
15 here. Because of course Joe Biden allegedly won  
16 Delaware County at 62.9 percent, by a margin of  
17 almost 88,000 ballots. Joining us now with his  
18 reaction, America's Mayor, and host of the Common  
19 Sense Podcast, Rudy Giuliani.

20 Mr. Mayor, we of course, saw the tapes  
21 that went on in Georgia. Now, were actually  
22 seeing these tapes in Pennsylvania. What they're  
23 trying to do, actually destroying evidence,  
24 altering evidence, are we going to see  
25 consequences?

1 RUDY GIULIANI: You know, we are,  
2 Natalie, it's going to have to build up. I mean,  
3 we've got this situation in Georgia, that video  
4 tape is about as clear evidence of stealing votes  
5 as I've ever seen.

6 And it was mischaracterized by the  
7 Secretary of State, the crooked Governor Kemp,  
8 the Democrats. I mean, they are all in league  
9 together.

10 I have no idea why the Republicans  
11 would want to vote for Kemp. I mean, he  
12 basically helped elect Democrats over and over  
13 again.

14 But in any event, we've got a tape in  
15 Georgia that's crystal clear. It looks like a,  
16 it looks like a bank robbery, my goodness. And  
17 this one is very, very clear. There were about  
18 10 others.

19 I mean, there's no doubt that people  
20 stole votes in that election for Biden. And the  
21 numbers are, I mean, I would say way beyond what  
22 was necessary to switch the vote in about four  
23 states.

24 But they certainly are extremely  
25 significant and can't be ignored. When people

1 cheat in elections on some kind of substantial  
2 scale, how do you know in advance without  
3 investigating it if it effects the election or  
4 not.

5 Right, I mean, if somebody says well,  
6 we stole 20,000 votes, and the margin is 30,000.  
7 Well, maybe if you started investigating, you'd  
8 find 100,000.

9 What they did here was, they just cut  
10 off any investigating. They even got the courts  
11 to get intimidated with the idea that this was a  
12 political question. So, I have about, I have  
13 about 500 affidavits, probably about 300  
14 witnesses. I didn't see this myself, Natalie,  
15 this is all American citizens --

16 NATALIE HARP: Right.

17 RUDY GIULIANI: -- from five different  
18 states explaining to me, either minor to massive  
19 fraud. These people wanted to be heard. Federal  
20 judges would not allow them to be heard.  
21 Finally, we got a --

22 NATALIE HARP: This is the people --

23 RUDY GIULIANI: -- couple of  
24 legislatures to listen to them. And that's why  
25 we have what is going on now, because we're able

1 to keep it alive.

2 NATALIE HARP: Right.

3 RUDY GIULIANI: But the evidence out  
4 there is, they haven't even touched the surface.  
5 Sometime if you want to come and visit, two rooms  
6 down, there's an entire room with videos, 500  
7 affidavits, diagrams, pictures that show  
8 substantial cheating, Pennsylvania's the worst by  
9 far.

10 NATALIE HARP: But you were there in  
11 Pennsylvania.

12 RUDY GIULIANI: Pennsylvania is A,  
13 number one, the amount of cheating in  
14 Pennsylvania was more than I thought they could  
15 do. I actually didn't think on election night  
16 when I first realized what they're scheme was --  
17 actually, the day after when Cory Lewandowski and  
18 Attorney General Bondi called me from  
19 Pennsylvania and said they wouldn't enforce the  
20 court order for us to look at the ballot, Mayor.  
21 I don't understand it, we got a judge's order,  
22 but the sheriff won't enforce it. I said, I'll  
23 be right there.

24 By the time I got there, they had this  
25 order to see the ballots, but they were being

1 held about 40 feet away. End result was, they  
2 went to the Supreme Court of Pennsylvania. In  
3 two hours, they got five Democratic judges to  
4 reverse it. And basically, say the Republicans  
5 didn't have the right to look at 700,000 paper  
6 ballots.

7 Which in my experience with election  
8 law, which goes back 40 years, never heard of  
9 that. Whenever you look at paper ballots, both  
10 sides get to examine it because paper ballots are  
11 the most prone to fraud. I've never heard of  
12 this before.

13 So, 700,000 ballots got counted in  
14 Pennsylvania and as far as we know they could  
15 have been made out by one of Joe Biden's kids,  
16 we've never got to see them, and we may not.

17 NATALIE HARP: And here we are a year  
18 later, we still don't see it. And now you have  
19 whistle blowers coming forward, Delaware County.  
20 But we still want to know what happened in  
21 Philadelphia and Pittsburgh, because those  
22 counties alone, that's determinative fraud.

23 RUDY GIULIANI: Well, yeah, there was,  
24 I mean, I know that there was substantial fraud  
25 in Delaware County. The most affidavits are

1 about Philadelphia. But then, yes, Pittsburgh,  
2 Delaware County.

3 By the way, a Democrat counties, some  
4 of which are highly corrupt, they tried to locate  
5 their fraud and this very craftly done in cities  
6 where they have complete control, the cities  
7 really aren't democracies, they are, they are  
8 petty little Democrat dictatorships. Like  
9 Pennsylvania --

10 NATALIE HARP: Right.

11 RUDY GIULIANI: -- I mean,  
12 Philadelphia, Pennsylvania, Detroit, Milwaukee,  
13 Chicago, Illinois, they didn't do it there, but  
14 they could have. New York, Boston, these are  
15 cities they own.

16 Interestingly, they're the 12 cities  
17 that are now setting records for murder, they're  
18 all Democrat cities --

19 NATALIE HARP: Exactly.

20 RUDY GIULIANI: -- all 12.

21 NATALIE HARP: It's so sad to see  
22 what's happening in this country. These Democrat  
23 cities, even when you look at red states. When  
24 you go into those blue counties, that they could  
25 flip states simply because their copying

1 shenanigans that have been around, in certain  
2 counties like you were just saying, for decades.  
3 But now, they're just replicating them on a scale  
4 that we've never seen before.

5 But Mr. Mayor, I want to have you back  
6 on next week because things are still coming out.

7 RUDY GIULIANI: Well, thank you,  
8 Natalie, you're doing a great job.

9 NATALIE HARP: Thank you. Well, thanks  
10 for keeping all that evidence out there. Courts  
11 never wanted to see it, but the people --

12 RUDY GIULIANI: Well, we got it, we got  
13 it, it's going to come out.

14 NATALIE HARP: Exactly.

15 RUDY GIULIANI: It's coming out a  
16 little at a time, but it will come out.

17 NATALIE HARP: So much evidence has  
18 come out already.

19 RUDY GIULIANI: Thank you.

20 NATALIE HARP: Thank you for what you  
21 do, Mr. Mayor.

22 RUDY GIULIANI: Thank you.

23 NATALIE HARP: God bless you.

24 RUDY GIULIANI: God bless.  
25

Page 10

C E R T I F I C A T I O N

I, Sonya Ledanski Hyde, certify that the  
foregoing transcript is a true and accurate  
record of the proceedings.

*Sonya M. Ledanski Hyde*

---

Veritext Legal Solutions  
330 Old Country Road  
Suite 300  
Mineola, NY 11501

Date: November 9, 2022

[10 - election]

Page 1

<b>1</b>	<b>advance</b> 5:2	<b>certify</b> 10:3	<b>crystal</b> 4:15
<b>10</b> 4:18	<b>affidavits</b> 5:13	<b>cheat</b> 5:1	<b>cut</b> 5:9
<b>100,000</b> 5:8	6:7 7:25	<b>cheating</b> 6:8,13	<b>d</b>
<b>11</b> 1:15 2:8	<b>alive</b> 6:1	<b>chicago</b> 8:13	<b>date</b> 10:16
<b>11501</b> 10:14	<b>allegedly</b> 3:15	<b>cities</b> 8:5,6,15,16	<b>day</b> 2:9 6:17
<b>12</b> 8:16,20	<b>allen</b> 2:21	8:18,23	<b>decades</b> 9:2
<b>12151</b> 10:8	<b>allow</b> 5:20	<b>citizens</b> 5:15	<b>december</b> 1:15
<b>2</b>	<b>alter</b> 3:12	<b>clear</b> 2:6 4:4,15	<b>delaware</b> 2:4 3:3
<b>20,000</b> 5:6	<b>altering</b> 3:24	4:17	3:16 7:19,25 8:2
<b>2021</b> 1:15	<b>america's</b> 3:18	<b>come</b> 3:14 6:5	<b>democracies</b> 8:7
<b>2022</b> 10:16	<b>american</b> 5:15	9:13,16,18	<b>democrat</b> 8:3,8
<b>22</b> 2:9	<b>amount</b> 6:13	<b>coming</b> 7:19 9:6	8:18,22
<b>3</b>	<b>attorney</b> 6:18	9:15	<b>democratic</b> 7:3
<b>30,000</b> 5:6	<b>b</b>	<b>common</b> 3:18	<b>democrats</b> 4:8
<b>300</b> 5:13 10:13	<b>back</b> 2:5 7:8 9:5	<b>complete</b> 8:6	4:12
<b>330</b> 10:12	<b>ballot</b> 6:20	<b>comply</b> 3:10	<b>destroying</b> 3:3
<b>4</b>	<b>ballots</b> 3:17 6:25	<b>consequences</b>	3:23
<b>40</b> 7:1,8	7:6,9,10,13	3:25	<b>determinative</b>
<b>5</b>	<b>bank</b> 4:16	<b>control</b> 8:6	7:22
<b>500</b> 5:13 6:6	<b>basically</b> 4:12	<b>copies</b> 3:9	<b>detroit</b> 8:12
<b>6</b>	7:4	<b>copying</b> 8:25	<b>diagrams</b> 6:7
<b>62.9</b> 3:16	<b>beyond</b> 4:21	<b>corrupt</b> 8:4	<b>dictatorships</b> 8:8
<b>7</b>	<b>biden</b> 3:15 4:20	<b>cory</b> 6:17	<b>different</b> 5:17
<b>700,000</b> 7:5,13	<b>biden's</b> 7:15	<b>counted</b> 7:13	<b>discussing</b> 2:21
<b>8</b>	<b>bless</b> 9:23,24	<b>counties</b> 7:22 8:3	2:24
<b>88,000</b> 3:17	<b>blowers</b> 7:19	8:24 9:2	<b>doing</b> 9:8
<b>9</b>	<b>blue</b> 8:24	<b>country</b> 8:22	<b>doubt</b> 4:19
<b>9</b> 10:16	<b>bondi</b> 6:18	10:12	<b>dream</b> 2:19
<b>a</b>	<b>boston</b> 8:14	<b>county</b> 2:4 3:3	<b>drive</b> 2:25
<b>able</b> 5:25	<b>build</b> 4:2	3:16 7:19,25 8:2	<b>e</b>
<b>accountable</b>	<b>bypass</b> 3:4	<b>couple</b> 5:23	<b>e</b> 10:1
2:18	<b>c</b>	<b>course</b> 3:15,20	<b>effects</b> 5:3
<b>accurate</b> 10:4	<b>c</b> 10:1,1	<b>court</b> 6:20 7:2	<b>either</b> 5:18
	<b>called</b> 6:18	<b>courts</b> 5:10 9:10	<b>elect</b> 4:12
	<b>certain</b> 3:9 9:1	<b>covered</b> 2:16	<b>election</b> 2:9 4:20
	<b>certainly</b> 4:24	<b>craftly</b> 8:5	5:3 6:15 7:7
		<b>crooked</b> 4:7	

[elections - numbers]

Page 2

elections 5:1 enforce 6:19,22 entire 6:6 event 4:14 evidence 3:12,23 3:24 4:4 6:3 9:10,17 exactly 2:11 8:19 9:14 examine 7:10 experience 7:7 explaining 5:18 exposing 2:11 extremely 4:24	getting 2:21 giuliani 1:14 3:19 4:1 5:17,23 6:3,12 7:23 8:11 8:20 9:7,12,15 9:19,22,24 go 8:24 god 9:23,24 goes 7:8 going 3:24 4:2 5:25 9:13 goodness 4:16 governor 4:7 great 9:8	intimidated 5:11 investigating 5:3 5:7,10  j  james 2:21 3:11 jim 2:20 job 9:8 joe 3:15 7:15 joining 3:17 judge's 6:21 judges 5:20 7:3  k  keep 6:1 keeping 9:10 kemp 4:7,11 kept 2:7 kids 7:15 kind 5:1 know 2:5 3:4,10 4:1 5:2 7:14,20 7:24  l  lamestream 2:17 law 2:7,9 7:8 lawyer 3:2 league 4:8 ledanski 10:3 legal 10:11 legislatures 5:24 lewandowski 6:17 listen 5:24 little 8:8 9:16 locate 8:4 look 6:20 7:5,9 8:23	looks 4:15,16  m  machine 3:3 making 3:9 man 3:14 margin 3:16 5:6 massive 5:18 mayor 3:18,20 6:20 9:5,21 mean 4:2,8,11 4:19,21 5:5 7:24 8:11 media 2:17 meet 2:19 milwaukee 8:12 mineola 10:14 minor 5:18 mischaracteriz... 4:6 months 2:8,9 murder 8:17  n  n 10:1 natalie 2:1 3:6 4:2 5:14,16,22 6:2,10 7:17 8:10 8:19,21 9:8,9,14 9:17,20,23 necessary 4:22 never 7:8,11,16 9:4,11 new 2:10 8:14 night 6:15 november 10:16 number 6:13 numbers 4:21
f  f 10:1 far 6:9 7:14 federal 2:8 5:19 feet 7:1 filed 2:5 finally 5:21 find 5:8 first 2:13 6:16 five 5:17 7:3 flip 8:25 foregoing 10:4 forward 7:19 four 4:22 fraud 5:19 7:11 7:22,24 8:5	h  handling 2:25 happened 7:20 happening 8:22 harp 2:1 3:6 5:16,22 6:2,10 7:17 8:10,19,21 9:9,14,17,20,23 heard 3:6 5:19 5:20 7:8,11 held 2:18 7:1 helped 4:12 highly 8:4 host 3:18 hours 7:3 hyde 10:3		
g  gallagher 2:24 3:2,11 general 6:18 georgia 3:21 4:3 4:15	i  idea 4:10 5:11 ignored 4:25 illinois 8:13 intact 2:8 interestingly 8:16		

[ny - video]

Page 3

<b>ny</b> 10:14	<b>q</b>	<b>s</b>	<b>stealing</b> 4:4
<b>o</b>	<b>question</b> 5:12	<b>sad</b> 8:21	<b>stole</b> 4:20 5:6
<b>o</b> 10:1	<b>r</b>	<b>savage</b> 2:20	<b>story</b> 1:13
<b>oan</b> 1:13,13	<b>r</b> 10:1	<b>saw</b> 3:20	<b>substantial</b> 5:1
<b>officials</b> 2:18	<b>reaction</b> 3:18	<b>saying</b> 9:2	6:8 7:24
<b>old</b> 10:12	<b>real</b> 1:13	<b>says</b> 5:5	<b>suite</b> 10:13
<b>order</b> 3:9 6:20	<b>realized</b> 6:16	<b>scale</b> 5:2 9:3	<b>supreme</b> 7:2
6:21,25	<b>really</b> 8:7	<b>scanners</b> 2:22	<b>surface</b> 6:4
<b>p</b>	<b>record</b> 10:5	<b>scenes</b> 2:12	<b>switch</b> 4:22
<b>pads</b> 2:21	<b>records</b> 2:7 3:9	<b>scheme</b> 6:16	<b>t</b>
<b>paper</b> 7:5,9,10	8:17	<b>second</b> 2:22	<b>t</b> 10:1,1
<b>pennsylvania</b>	<b>red</b> 8:23	<b>secretary</b> 4:7	<b>talking</b> 3:11
1:13 2:4,7 3:22	<b>released</b> 2:3,11	<b>see</b> 3:14,24 5:14	<b>tape</b> 4:4,14
6:11,12,14,19	2:14 3:8	6:25 7:16,18	<b>tapes</b> 3:3,20,22
7:2,14 8:9,12	<b>replicating</b> 9:3	8:21 9:11	<b>team</b> 2:19
<b>pennsylvania's</b>	<b>republicans</b> 4:10	<b>seeing</b> 3:22	<b>thank</b> 9:7,9,19
6:8	7:4	<b>seen</b> 2:16,17 3:6	9:20,22
<b>people</b> 4:19,25	<b>request</b> 2:5 3:4	4:5 9:4	<b>thanks</b> 9:9
5:19,22 9:11	3:10	<b>sense</b> 3:19	<b>things</b> 9:6
<b>percent</b> 3:16	<b>result</b> 7:1	<b>setting</b> 8:17	<b>think</b> 6:15
<b>petty</b> 8:8	<b>reverse</b> 7:4	<b>shenanigans</b>	<b>thought</b> 6:14
<b>philadelphia</b>	<b>review</b> 2:13	1:13 2:3 9:1	<b>three</b> 2:2
7:21 8:1,12	<b>rid</b> 2:21	<b>sheriff</b> 6:22	<b>time</b> 6:24 9:16
<b>pictures</b> 6:7	<b>right</b> 2:4 3:4,10	<b>show</b> 6:7	<b>tom</b> 2:24 3:2,10
<b>pittsburgh</b> 7:21	5:5,16 6:2,23	<b>showing</b> 2:3,6	<b>touched</b> 6:4
8:1	7:5 8:10	<b>sides</b> 7:10	<b>transcript</b> 10:4
<b>plan</b> 3:12	<b>road</b> 10:12	<b>signature</b> 10:8	<b>tried</b> 8:4
<b>plays</b> 2:23 3:1,5	<b>robbery</b> 4:16	<b>significant</b> 4:25	<b>true</b> 10:4
3:13	<b>room</b> 6:6	<b>simply</b> 8:25	<b>trying</b> 3:23
<b>podcast</b> 3:19	<b>rooms</b> 6:5	<b>situation</b> 4:3	<b>two</b> 6:5 7:3
<b>political</b> 5:12	<b>rud</b> 1:14 3:19	<b>solutions</b> 10:11	<b>u</b>
<b>previously</b> 2:13	4:1 5:17,23 6:3	<b>somebody</b> 5:5	<b>understand</b> 6:21
<b>probably</b> 5:13	6:12 7:23 8:11	<b>sonya</b> 10:3	<b>v</b>
<b>proceedings</b>	8:20 9:7,12,15	<b>started</b> 5:7	<b>v</b> 2:24
10:5	9:19,22,24	<b>state</b> 4:7	<b>veritext</b> 10:11
<b>prone</b> 7:11	<b>rumble</b> 1:14	<b>states</b> 4:23 5:18	<b>video</b> 2:10,23
		8:23,25	3:1,5,8,13 4:3

[videos - ziegelhoffer]

Page 4

<b>videos</b> 2:2,6,13 6:6 <b>violations</b> 2:6 <b>visit</b> 6:5 <b>voiceover</b> 2:20 <b>vote</b> 4:11,22 <b>votes</b> 4:4,20 5:6 <b>voting</b> 3:3
<b>w</b>
<b>want</b> 4:11 6:5 7:20 9:5 <b>wanted</b> 5:19 9:11 <b>watching</b> 2:15 <b>way</b> 4:21 8:3 <b>we've</b> 4:3,14 7:16 9:4 <b>week</b> 9:6 <b>weeks</b> 2:2 <b>went</b> 2:3,12 3:21 7:2 <b>whistle</b> 7:19 <b>whistleblower</b> 2:2,10,25 3:8 <b>witnesses</b> 5:14 <b>won</b> 3:15 <b>worst</b> 6:8
<b>y</b>
<b>yeah</b> 7:23 <b>year</b> 7:17 <b>years</b> 7:8 <b>york</b> 8:14
<b>z</b>
<b>ziegelhoffer</b> 3:11